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VIA ECF AND EMAIL:

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The Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: *In re: Bernard L. Madoff*, Adv. Pro. No. 08-01789 (SMB)

Dear Judge Bernstein:

We write on behalf of the good-faith Defendants represented by Chaitman LLP (“Defendants”) in response to the Trustee’s Notice of Presentment of Order Implementing the Court’s May 31, 2017 and June 29, 2017 Bench Rulings on Multiple Discovery Issues. (ECF No. 16318).

The Trustee filed the Proposed Order Implementing the Court’s May 31, 2017 and June 29, 2017 Bench Rulings on Multiple Discovery Issues (the “Proposed Order”) on July 11, 2017. Although the Trustee took twelve days to draft the Proposed Order, the Trustee has now set an objection deadline for 4:00 p.m. today, July 12, 2017, and a presentment time of 4:00 p.m. on July 13, 2017.

In order to permit Defendants a reasonable opportunity to review the Trustee’s Proposed Order and file their objections, Defendants respectfully request that the Court grant a 24-hour extension of these deadlines so that Defendants may file their objections by 4:00 p.m. on July 13, 2017.

Respectfully submitted,

/s/ Helen Davis Chaitman

Helen Davis Chaitman, Esq.

HDC:leb

cc: Nicholas Cremona (ncremona@bakerlaw.com)